THOMPSON
HINE & FLORY LLP

Attorneys at Law

Ben L. Pfefferle III - 469-3235 - bpfefferle@thf.com

September 15, 1998

Mr. Sirtaj Ahmed
Remedial Project Manager
USEPA Region V
SR-6J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Granville Solvents Site

Dear Mr. Ahmed:

Thank you for the time that you, Ms. Vanterpool, and your colleagues at Ohio EPA spent with representatives of the Granville Solvents Site PRP Group on August 28. The PRP Group is committed to performing the work outlined in the EE/CA, after we have completed the public notice requirements and have received USEPA's authorization to proceed. I would like to take this opportunity to summarize the meeting; please let me know immediately if you believe that I have misstated anything. It is very important to us that there not be any misunderstandings; I know that is very important to you as well. Finally, I would like to acknowledge receipt of your September 4 letter, which we are evaluating separately.

I trust that Gerry Myers and I adequately summarized the history of the site and the PRP Group for you The PRP Group installed the pump and treat system to act as a hydro geologic barrier in 1994 and approximately 446,900,000 gallons of water have been treated to date. The replacement drinking water well (PW-4) for the Village of Granville was installed in 1996 and the village has assumed responsibility for its operation. The well closest to the site, PW-1, is no longer operated by the village. The groundwater monitoring system has been installed and has been sampled on several occasions. The PRP Group is now at a critical decision point with respect to addressing the soils, which is the last element of the response action at the site.

Investigation has confirmed that the contaminant plume is shrinking, when compared to the conditions immediately prior to installation of the groundwater pump and treat system. Of the 446,900,000 gallons of water treated to date, Metcalf & Eddy estimates that about 35 gallons or 367 pounds of contaminant mass have been removed. The discharge from the pump and treat system has at all times been below the applicable MCLs.

G:\WPDATA\GSI\Ahmed letter.wpd

In order to provide an extra measure of conservatism, the first EE/CA and Groundwater Fate and Transport Model provided to EPA assumed that all VOCs were PCE and TCE. At the request of the previous regional project manager, Metcalf &Eddy re-ran the model and established clean up criteria for each containment for direct contact in soil using industrial standards with standard risk assessment assumptions. A risk assessment for industrial and excavation workers was performed based upon current soil and groundwater conditions and after the remediation is completed. All chemicals met the 10-5 risk standard except for 1, 1 DCE. The current conditions at the site meet the Remedial Action Goals except for PCE and TCE. Metcalf & Eddy then identified the areas on site where PCE and TCE exceed the risk based clean up standards. No soil remediation off-site will be required.

Deborah Gray, Metcalf & Eddy's toxicologist, confirmed that the risk was evaluated for all contaminants, but the only chemical contaminants requiring remediation are TCE and PCE. It is our understanding that Tim Chrisman of Ohio EPA and Luann Vanterpool are satisfied with the evaluation performed by Metcalf & Eddy.

The PRP Group evaluated several alternatives to address the chemicals of concern in the soil, all of which are summarized in the EE/CA. Pneumatic fracturing of the soil, together with soil vapor extraction of the contaminants and continued operation of a modified pump and treat system to enhance removal of the contaminant mass is the preferred remedy. This alternative is the least sensitive to treatment area and will allow termination of the pump and treat system in five to ten years. Excavation is not feasible due to the site topography and lay-back requirements. Tim Chrisman's comment about the challenge to reach contaminants below the water table is moot because of the operation of the pump and treat system. Luann Vanterpool commented that she liked the idea of enhanced pump and treat for an added level of protection.

Metcalf & Eddy expects the pneumatic fracturing wells to be placed approximately every fifty feet, and that wells will be up to 20 feet deep — to the end of the clay zone or water table, whichever comes first. Field decisions may require the installation of some additional fracturing wells, but this is not anticipated to be a material issue. A design document will be created after EPA provides its concurrence on the clean up standards and goals and objectives of the selected remedy.

In response to your inquiry about whether ARARs will be met, it appears that the only pertinent ARARs will be the MCLs at the compliance point in the groundwater. We have agreed to provide a table of ARARs for the EE/CA, and hope to have that information to you shortly. In response to Fred Myers' inquiry about whether RCRA ARARs should be included, it is our initial belief that they are not applicable. However, we are continuing to evaluate this issue. It is our understanding, based upon conversations with Mr. Chrisman, that a state permit to install for the pneumatic fracturing system will not be required, as only air will be injected into the wells.

We would also like to confirm the PRP Group's desire for an expeditious review and approval of the EE/CA report, and then have the approval go through the public notification and comment process as a Non-Time Critical Removal Action. Metcalf & Eddy will include a milestone date in the construction schedule for preparation of a design document, as you have requested. Although a ROD will not be required, it may be appropriate to prepare an Action Memorandum.

In response to your request for data in the EE/CA and Groundwater Fate and Transport Model in electronic format, Metcalf & Eddy is assembling the data in spreadsheet format and the diskettes will be forwarded to you. We appreciate your comment that you are satisfied with the work performed to date and your affirmation that you do not intend to challenge or re-do the work performed.

Although you were unable to provide your formal final approval of the reports at the meeting, we are pleased with your comment that you have no reservations about the work performed to date by the PRP Group and Metcalf & Eddy. Please contact me immediately if you believe that anything in this letter has been misstated.

Sincerely,

Ben L. Pfefferle, III
Granville Solvents Site PRP Group Chairperson

cc: Michael Anastasio, Esq.
Steering Committee
Technical Committee
Gerald Myers